

My Embryology Lecture on Development of the  
Respiratory System and (EXHIBIT 38,

&

The Multiple Double Jeopardy Discriminatory Practices  
Thomas Jefferson University (TJU) Employed In Denying  
Me Over \$650000 in Commensurate Wages and Benefits  
Plus Negative Promotion Decisions That Interrupted and  
Completely Ruined My Career.

2005-2013. 8 Years promised of a recommendation at Assistant  
Professor level.

Got reneged.

8 years of stagnation to my career pathway and growth

DOUBLE JEOPADY.

The slave era salary of \$40000/yr salary , compared to the  
\$90000 /yr salary to 2 of my colleagues, (Dr. Lopez and  
Dr.Guiyun Zhang , same Medical degree, both much less  
experienced, same responsibilities, same Supervisors (even  
though I performed more responsibilities 2010-2013) Course  
Director, most advanced Anatomy Course.

If there is anything, called a “triple jeopardy” TJU through its Vice Provost never considered those 13 years as part of TIR , complete non-CONSIDERATION OF what TIME IN RANK were to achieve- ***MATURITY and EXPERIENCE***

Between 2015 and 2021 , in Scholarship, accomplished in those 6 years

- 19 PRP
- ALL 19 as 1<sup>st</sup> Author
- 15 as SOLE Author
- Sperb Prestigious Hor and Recognitions by my peers  
American Association of Clinical Anatomists-most  
prestigious Anatomical Association world wide

### EXHIBIT 30

The 2020 AACA Abstract Reviewer Request Form  
which stated,

“On behalf of the Association we are contacting you to ask for your assistance with what we believe is *one of the most important elements in organizing the scientific sessions for the 2020 AACA Annual Meeting* in New York, reviewing abstracts.

- In 2021- Invitation from AACCA to be a JUDGE in determining the Best Student Planform Presentation for an Award.

Any group of Honorable Jurors will find it difficult reconciling above ACCOLADES with the underforwarded , letter of 6/30/2022 from The Vice Provost

*For many reasons, including time in rank and your recent and limited engagement in external activities in the area of external service/impact, you would not have been eligible for promotion at an earlier period*

The 8 years (2005-2013) were never considered as part my TIME IN Rank in

- 2020 Requested promotion to Clinical Associate Professor
- 2022 in Requested promotion to Clinical FULL.  
Professor

2013-2018.

My nomination for promotion t from Clinical Instructor to Clinical Assistant, inappropriately delayed.

1YR TIR made 5 years.

Decisional Makers intentionally submitted a misleading 2015/2016 evaluation

Double / tripple? . jeopardy STOLEN YEARS never considered as part of my TIR

Misleading Evaluations was weaponized as “ No enough time in Rank2020 and 2022 when I requested for promotions to Clinical Associate and Clinica/ Full Professor in 2022

Vice Provost and TJU weaponized the negative evaluations as COCERNS FOR YOUR TEACHING EFFECTIVENESS

2015 – Nomination and process of promotion scuttled from “Concerns for teaching effectiveness” meant.

Another 4 Years ARREST of my Carrer growth

Collateral Damages.

Denied access to early rise along my career ladder growth and for 4 Years In 2018, when finally made a Clinical Assistant had enough to be considered a Clinical Associate Professor

2018

THAT I FINALLY EARNED Assistant Professor promised in 2005

Those 13 years were not Considered as part of my TIR

2020-Requesying a promotion to Clinical Associateye Professor

2022- When I requested for a promotion to Clinical FULL  
Professor, those 13 years to TJU DO NOT MATTER

TO TJU. those 13 Years DID MATTER entitled to in 2005 , MD,  
MBA, Terminal Degrees, MD ,DO, Ph.D and MD., Ph.D in basic  
Siences are employed entry level as ASSISTANT PROFESSOR

Weaponized Teaching Ineffectiveness were LIES AND  
FALSEHOODS

TIME-IN RANK

- Disingenuous
- Twisting the Truth to weaponize
- Despicable
- A mischief

Absent equitable treatment and fair processes in employment  
decisions as this being economical with the truth, with important  
implications for an institution's academic and social standing

(Leap, 1995; Poskanzer, 2002) as maintaining and respecting traditional values of higher education—most importantly, the unimpeded search for truth are grossly violated recklessly without conscience. What does it PROFIT Tju, with rigid interpretation to weaponize TIR, so that I am robbed my honor?.

TJU is behaving this ‘eating ones cake and wanting to have this back.

The climax, those unprintable coercion, arm twisting, academic promotion being politicized and being contingent on.” you must understand that there can be no guarantees that your application will result in actual promotion.

clear, we will not agree to provide any additional compensation, *as we believe you have been compensated fairly and equitably throughout your Jefferson employment. That was as at 6/30/2022*

*TJU felt MISDESIGNATING ME as Research Associate takes away or makes irrelevant yarsticks of salary determination*

*My academic background*

*My experiece -23 years on starting Full time employment and 40 years at Retirement*

## *Responsibilities-*

If you wish to move forward with the promotion process and I

'Will provide you with the *necessary release*

*document* and, following your execution of that document

by these unnecessary and undeserving spinning and deceit.

( 1 I consistently taught Anatomy consistently (Alexander & Alexander, 2011; Chait, 2002a; Kaplin & Lee, 2006).

technically weaponizing this tantamount yo

BY 2020, 13 Years of my Career growth were WIPED OUT and weaponized in “No Sufficient Time In Rank

2020

2022.

extrme financial exploitation.

A double Jeopard

(Leap, 1995; Toma,

- 2011).

## Established Adverse Reactions.

None of my 2 other colleagues with same medical background MISDESIGNATED A Research Associate.

None was on a salary of \$40000/yr unlike the commensurate \$90000 /000 paid to these other 2 colleagues.

At no time were concocted “concerns for your teaching effectiveness

“ weaponized when my other 2 colleagues were considered for promotions- as Dr.Zhang rose to Full Professor in 9 years, while I was STAGNATED at the level of ASSISTANT 2013-2022

Rational Jury can see from my levels of Scholarship, Evaluations of teachings and Services (Externally/



Internally

A situation where a Colleague (Dr.Zhang with Zero International, Zero Invitations/Nil fewer scholarship, only invited to 1 Anatomical Society invitations compared to my 12 International Invitations and recognitions in about 5-7 Worldwide Anatomical Association/ Meetings. A juror pool would want to see how I was stagnated at the level of ASSISTANT Professor and a colleague with deficit Scholarship, while I was the one selected to Teach as Course Directors Final Years and Resident Doctors, Dr. Zhang only was Course Director to Physician Assistant Students. That was comparison in Education.

I had better educational Diversification, MD,MBA vs MD-Ph.D. I spent 5 years a Medical Trainee in Research at prestigious UPENN Medical School with PRP to show for this..

Dr. Zhang only taught Anatomy at JEFF- I had glowing records from Penn Anatomy and Penn Dental Schools, Temple PA College Podiatry, even over 15 years Teaching Anatomy at TJU before Dr.Zhang got to JEFF. In my 1<sup>st</sup> 10 years at JEFF, the difference was I did not give any Lectures, whatever I did in those 10 years were same in my last 17 years, despite that TJU only paid me \$3000/per 200 hrs. of dissection teaching and Supervision- (a \$15/hr- a greatBOOTY to TJU.

AN MD as Assistant Prof. those 10 years would have received \$900000. I only earned \$30000 in those 10 years. What a BOOTY to TJU then.

Now, FULL TIME DENYING ME OVER \$650000 In Non- commensurate wages for my SWEAT, LABOR, EXPERIENCE, RESPONSIBILITIES, what a UNFAIR WORLD.

Where is the MORALITY  
WHY this much CONSCIENCELESSNESS?

Not too surprised. The profiteering is what what is constant with TJU. BUT TJU rewarded itself when that BLACKMAN got removed and Replaced, a capitulation to a pedigree (Evidences 2006-2010 Schedule of HF&D Teaching Schedule are evidentiary.

But considered UNINTELLIGIBLE by Defendant Attorney when I requested this during Discovery from Defendant Attorney

FACTS DON'T LIE.

Yes,

toof am more d most favorable orth with admissible evidence that demonstrates “such weaknesses, implausibilities, inconsistencies, incoherencies, or contradictions” that would permit a rational jury to conclude the legitimate reason offered is “unworthy of credence” and that the real reason for the adverse action is

unlawful discrimination. Id. at 765. A plaintiff may do so by showing: (1) the employer has previously discriminated against [them]; (2) the employer has discriminated against other persons with in the plaintiff’s protected class or within another protected class, or (3) the employer has treated more favorably similarly situated persons not within the protected class. Id.

Each Time in my Academic Career were in Consideration for a Promotion through

Nominated for a Promotion (2013-2018)

Delayed Promotion (2015-2018),

Denied Promotion

`2020

(Requesting for a Promyion of Clinical Associate Professor

2022 Denied Requesting a Promotion to Full Professor  
.on my Academic Career that ended on destroying my  
Academic Career

/6/30/ 2022 -Offered promotion to Clinical Associate  
turned to be A Greek Gift, as coercion, arm twisting  
threats , ALL OR NONE. Not entitled to Rights.

The many ways TJU at my at my Requests for promotion  
got mutilated

## PERIODS

2013-2018- Nomination for and Promotion Proceed

2020

2022

was promoted Clinical Assistant Professor in 2018, a  
Position I was promised to be recommended for in 2005.

Period 2005-2018 , a total of 13 years can be split into:

2005-2013 -8YRS of misdesignation and exploitation

2013-2018- 5 YRS TJU Decision maker caused a 4YR delay  
in my Promotion submitting a misleading and biased  
2016/2016 Evaluation

2020 . A CASE From a negative scholarly review

In 2020 during my annual performance Review with the Vice-Chairman Prof. SUE requested to be nominated for a promotion to Clinical Associate Professor. instead of being able to focus on the primary mission of teaching and scholarship,

This was denied

I requested for a Promotion to the Clinical Associate Professor Position.

Reasons for Denial

Vice-Chairman Prof Menko cited 3 comments 1.

Dr Ariyo rolled eyes when a Student gave a wrong answer

Dr Ariyo asked a Lower limb question while group were dissecting Upper limb

3. Dr. Ariyo discussed Polyspermy while discussing acrosomal reaction and egg fertilization (1<sup>st</sup> comment-unworthy of being dignified)

Comments 2 & 3 are legitimate and valid educational materials clinically valid

But Vice Provost under Oath Vice-Provost-Commented that I was denied Promotion because "Limited Time in Rank"

2 Institutional Decision makers, non-congruency in why I was denied a promotion to Clinical Associate Professor

Hence above illustrate non congruency in given reasons for denial of promotion. Inconsistent yardsticks for promotion.

Individualized

Promotion protocols violated

2022.

Requested for Promotion to FULL Professor

TJU and Vice Provost explained why this was denied

Principally (No enough Time in Rank.

Limited Impacted

Limited External Service

2015-Nomination Inappropriately delayed

.

Reason. Weaponized ""Concerns for my teaching effectiveness

Summary.

Were it not for my regularization a Faculty Member by Prof. Peiper 1n 2011/2012, who investigated pedled lies Of "teaching ineffectiveness "leveraged by late Prof. Schmidt, those were investigated 2 Professors anonymously sent to observe my performance during LECTURE delivery RETURNING verdicts of Very Good and Excellent respectively.

Submission of a misleading 1<sup>st</sup> Year Med-Students evaluation requesting students to review my lecture delivery performance

Scuttled my nomination- Promotion Proceess 1 YR TIR made into 5YRS TIR evaluation rep in

INTELLECUAL Economic al Truthfulnee..

What I find most disturbing is the level TJU may go in being economical with the TRUTH.

### *TJU Faculty Handbook*

Equitable treatment and fair processes in employment decisions have important implications for an institution's academic and social standing (Leap, 1995; Poskanzer, 2002).

Is essential to maintaining traditional values of higher education—*most importantly, the unimpeded search for truth* (Alexander & Alexander, 2011; Chait, 2002a; Kaplin & Lee, 2006).

Multiple PROMOTION decision Interrupt my career career;

- Career can be completely ruined (Leap, 1995; Toma,
- 2011).

Yet even when a court finds that an institution has acted in a discriminatory manner



- The collective lesson from these scholars is *that basing arguments on data and drawing conclusions from systematic analysis is fundamental to the academy.*
- institutions infringed upon my rights,
- Discriminated against a professor, or
- Breached a contract with a professor.
- Courts granted legal and equitable remedies when institutions infringed

In addition to emotional, financial, and reputational harms

## PROCEDURES FOR FACULTY APPOINTMENT AND PROMOTION *TJU Faculty Handbook*

### 8.1 Overview of Jefferson's Appointment, Promotion, and Tenure Tracks and Guidelines

Jefferson's appointment, promotion, and tenure systems are intended to facilitate *continued career growth and professional success throughout the continuum of a faculty member's career*, and, in turn, enable the success of each of the colleges and the university. A thriving and successful faculty is essential for the university to fulfill its mission to improve the lives of its students, patients and the greater society. Further, Jefferson's appointment, promotion and

tenure systems are aligned with the university's desire to provide a culture that promotes excellence in achievement and the life-long professional growth and personal wellness of its students and faculty.

It can be seen the several multiple ways TJU and its many Decision makers ensured these laid down Institutional Protocols were abused and weaponized leading to me of my Career. There was nothing continuous with my career growth. At TJU,

There was NO CONTINUUM to facilitate my continuous growth, but weaponization of lies- TJU trying to deceive the public I only performed "limited lecturing and limited teaching as opined under oath by Vice Provost an attempted cover up . On 3 different occasions I approached TJU to complaint about the misrepresentation of abuses resulting in my Career disjointed, career growth thwarted by non- adherence to Institutional laid down Promotion Calendars and Promotion needed to be based on.

That at TJU the essential traditional values of higher education, most importantly, the unimpeded search for truth were chronically trampled upon by multiple individual authority figures as well as the Institutional itself, such torrents of untruthfulness including not limited, dating back to 1<sup>st</sup> day of my full time employment, in 2005, then Vice Chairman, Late Professor Schmidt reneging on promise made to recommend me at the Assistant Professor level, same late Vice-Chairman in

YR2015/2016with his surrogate Dr. Spudich intentional submission of a misleading Students evaluations which scuttled the promotion process converting a required 1year- Time in Rank (TIR) between a Clinical Instructor to a Clinical Assistant Professor to 5years TIR (2013-2018) ,and a 4 year-delay hurting my rise along the ladder of academic prominence and stature, many untruthfulness including “Concerns for my promotion from peddled lies by late Prof. Schmidt with some unbelievable humiliating highly offensive and condescending comments from Vice- Provost Prof.Novielle insensitive to the hurt, the torture from hurtful racist comments, noxious hostile environment so suffocating that I reported almost 3years before my retirement. and in my last date of employment there were multiple layering of untruthfulness in the 6/30/2022 letter from the Vice Provost.

. College and university administrators claim that faculty salary depends on

Productivity in the areas of

- Teaching,
- Scholarship,
- Service

Olutayo Ariyo

Signed OLUTAYOARIYO.